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**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

KINSALE INSURANCE COMPANY, an  
 8 Arkansas corporation,

Case No.: 2:24-cv-00997-RFB-NJK

9 Plaintiffs,  
 10 vs.

11 SVS SECURITY LLC, a Nevada limited  
 12 liability company; HENRY WILLIS  
 13 WEBB, JR., an individual; MEISHA  
 14 LARITA WEBB, an individual and Special  
 15 Administrator of the Estate of Breeana  
 Larita Webb (Deceased),

**AMENDED ANSWER TO  
 KINSALE INSURANCE  
 COMPANY'S FIRST AMENDED  
 COMPLAINT FOR  
 DECLARATORY RELIEF AND  
 REIMBURSEMENT OF DEFENSE  
 FEES AND COSTS**

16 Defendants.

17 Defendant SVS SECURITY LLC ("SVS"), by and through its counsel  
 18 undersigned, for its Answer in this matter, hereby admits, denies, and alleges as  
 19 follows:

**ANSWER**

20  
 21 1. SVS is without sufficient information to form a belief as to the truth of  
 22 the allegations contained in paragraphs 1, 5, 7, 8, 12, 30, 31, 33, 34, 35, 36, 37, 38, 39,  
 23 40, 41, 42, 43, 44, 45, 46, 47 and 48.

24 2. SVS admits the allegations contained in paragraphs 2, 3, 4, 6, 10, 11, 15,  
 25 24, 25, 26, 27, 28 and 32.

26 3. In answering paragraph 9, Defendant admits that it's members are  
 27 domiciled in Nevada and citizens of Nevada and do not have domicile in Arkansas or  
 28 Virginia. Defendant is without sufficient information to form a belief as to the truth of

1 the rest of the allegations contained in paragraph 9.

2       4. In answering paragraph 13, Defendant admits that Kinsale could  
 3 reasonably anticipate that the cost of defense and potential damages could exceed  
 4 \$75,000.

5       5. In answering paragraph 14, Defendant admits that a substantial amount  
 6 of events that arose occurred in this District and Defendant's in this action reside in this  
 7 District.

8       6. In answering paragraphs 16-22, Defendant did not read the policy when  
 9 signing, but has no reason not to believe that the language cited in these paragraphs is  
 10 accurate and states that the documents language referenced therein speak for  
 11 themselves.

12       7. In answering paragraph 23, Defendant admits that the excess policy  
 13 contains the endorsement and contains the language cited therein.

14       8. In answering paragraph 29, Defendant admits the allegations contained  
 15 therein except that it is without sufficient information or belief as to whether the law  
 16 provides the right for Kinsale to seek reimbursement of any amounts Kinsale spends to  
 17 defend Defendant in the underlying action.

### **AFFIRMATIVE DEFENSES**

#### **FIRST AFFIRMATIVE DEFENSE**

20 It is unknown whether the Court has jurisdiction over this matter.

#### **SECOND AFFIRMATIVE DEFENSE**

22 Plaintiff's Complaint fails to state a claim for which relief can be granted.

#### **THIRD AFFIRMATIVE DEFENSE**

24 Plaintiff waived it's allegations set forth in the Complaint.

#### **FOURTH AFFIRMATIVE DEFENSE**

26 Plaintiff's claim is barred under the doctrines of laches and estoppel.

## **FIFTH AFFIRMATIVE DEFENSE**

Plaintiff's Complaint shows a lack of good faith and fair dealing since they issued a policy that they apparently believe covers next to nothing.

## **PRAYER FOR RELIEF**

WHEREFORE, SVS hereby prays for relief as follows:

- a. Plaintiffs take nothing by reason of their Complaint;
- b. For an award of attorney's fees and costs incurred in this matter
- c. For such further or other relief as the Court deems just or proper.

Dated this 1st day of November, 2024.

## **FENNEMORE CRAIG, P.C.**

/s/Patrick J. Sheehan, Esq.

Patrick J. Sheehan, Esq. (No. 4833)  
9275 W. Russell Road, Suite 240  
Las Vegas, NV 89148  
*Attorney for Defendant SVS Security*

**CERTIFICATE OF SERVICE**

Pursuant to FRCP 5(b), I hereby certify that I am an employee of Fennemore Craig, P.C., and that on this date, I served, or caused to be served, a true and correct copy of the foregoing **AMENDED ANSWER TO KINSALE INSURANCE COMPANY'S FIRST AMENDED COMPLAINT FOR DECLARATORY RELIEF AND REIMBURSEMENT OF DEFENSE FEES AND COSTS** on the parties set forth below via electronic notification through the Court's CM/ECF system, addressed as follows:

Matthew J. Hafey, Esq.  
Timothy P. Kitt, Esq.  
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15 -and-  
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Attorneys for Plaintiffs

20 || Dated: November 1, 2024.

/s/Trista Day-Yanez

An employee of Fennemore Craig, P.C.